

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JUANA SIERRA,

*Plaintiff,*

07 Civ. 6769 ( JSR )

- against -

**AFFIDAVIT**

CITY OF NEW YORK; NEW YORK CITY  
DEPARTMENT OF BUILDINGS, and PATRICIA  
J. LANCASTER, in her capacity as  
COMMISSIONER OF NEW YORK CITY  
DEPARTMENT OF BUILDINGS; NEW  
YORK CITY DEPARTMENT OF HOUSING  
PRESERVATION AND DEVELOPMENT, and  
SHAUN DONOVAN, in his capacity as  
COMMISSIONER OF NEW YORK CITY  
DEPARTMENT OF HOUSING PRESERVATION  
AND DEVELOPMENT; and EMAD IBRAHEM.

*Defendants.*

X

STATE OF NEW YORK )

SS.:

COUNTY OF NEW YORK )

I, KRISTA HANSON, declare under penalty of perjury,

1. I am currently a Master's candidate at New York University's Steinhardt School in the Department of Culture and Communication.

2. I am currently interning at the Urban Justice Center to get exposure to professional applications of public interest law. I am under the supervision of Rebecca Widom, the Director of Research in the Homelessness Outreach and Prevention Project.

3. My unpaid internship at the Urban Justice Center began on January 16, 2008 and ends in May 2008.

4. I was provided an Excel spreadsheet with a catalogue of addresses of SRO buildings along with corresponding tract, block, and lot numbers from the West Side

SRO Law Project. I was explained that this list was generated in 2007 and included some known SRO buildings on the West Side of Manhattan.

5. I created a new Excel spreadsheet with this existing information and began adding new data in columns I, J, and L from the New York City Department of Housing Preservation and Development (HPD) website. Column I indicates the number of "A units" in the property. Column J indicates the number of "B units" in the property. Column K was intentionally left blank. Column L indicates my notes, where I believed it was necessary. (Attached as Exhibit A)

6. I only used the HPD website to gather information regarding the number of units in each SRO building listed in the spreadsheet. I accessed the HPD website through the Internet located at: <http://www.nyc.gov/html/hpd/html/pr/violation.shtml>.

7. The website provides building information for multiple dwellings in New York City and offers an option to search for information (complaints, violations, and registration information) by address.

8. I entered the address information listed in columns B, C, and D into the website and was able to obtain the number of A and B units at each address.

9. Through repetition of this web-based search method, I compiled data for all but 18 of the addresses listed on the spreadsheet. Of the 18 addresses for which I could not get information, 13 addresses were not found through the web-based search, one address was a duplicate on the list, and four addresses were listed as "inactive" or on the same lot as another listed property, with the same number of A and B units, raising a flag of potential duplication. Therefore, for these 18 addresses, in order to prevent double counting or other errors, I did not enter any information in columns I and J.

10. Additionally, 56 of the addresses listed in the spreadsheet are listed in the HPD database under a different primary address, but they were cross referenced with the address used to search. For each of the 56 addresses where a different primary address appeared in the search results, I made a notation in Column L indicating that the address was "also known as."

11. According to this methodology, there were a total of 30,889 units in the buildings listed on the spreadsheet, including 25,692 B units and 5,197 A units.

12. According to the HPD Online Glossary, available at [http://167.153.4.71/Hpdonline/help\\_glossary.aspx](http://167.153.4.71/Hpdonline/help_glossary.aspx), states that a "B" unit can be a rooming unit, single room occupancy unit or a hotel unit. A rooming unit shall mean one or more living rooms arranged to be occupied as a unit separate from all other living rooms, and which does not have both lawful sanitary facilities and lawful cooking facilities for the exclusive use of the family residing in such unit. A single room occupancy unit is the occupancy by one or two persons of a single room, or of two or more rooms which are joined together, separated from all other rooms within an apartment so that the occupant(s) thereof reside separately and independently of the other occupant(s) of the same apartment. A hotel unit is a unit in an inn having thirty or more sleeping rooms."

Dated: January 25, 2008



Krista Hanson

Sworn to before me this 25<sup>th</sup> day of January, 2008



Notary Public

**AMI T. SANGHVI**  
**Notary Public, State of New York**  
**No. 02SA6147026**  
**Qualified in New York County**  
**Commission Expires May 30, 2010**